



**(c) Settlement Efforts.**

The parties have discussed settlement but do not believe it is possible at this stage.

**(d) Agreed Proposed Schedule (or Alternative Proposals) for the Next 45 Days:**

Given the parties' pending forum-related motions requested by this Court (Dkts. 84-85), the parties agree they will await the Court's ruling on those motions before submitting proposed schedules for other case events such as discovery and dispositive motions (and also will refrain from proceeding with any discovery).

**(e) Agreed Proposed, Revised Discovery and Dispositive Motion Schedule (or Alternative Proposals) Where the Current Schedule Needs Revision:**

Not applicable. There is no existing discovery and dispositive motion schedule.

**(f) Any Agreed Action that the Court Can Take without a Hearing:**

Not applicable, unless the Court would like the parties to address any questions relating to one or both of the pending forum-related motions (Dkts. 83-87).

**(g) Whether the Parties Believe a Telephonic Hearing with the Judge is Necessary and Time Urgent (and, If So, Identify the Issue that Warrants Discussion):**

The parties agree no telephonic hearing is necessary, unless the Court would like the parties to address any questions relating to one or both of the pending forum-related motions (Dkts. 83-87).

///

///

///

///

///

///

Respectfully submitted this 16<sup>th</sup> Day of May 2020,

<p><u>/s/ Michael W. Ford</u> Michael W. Ford, Esq. <b>LAW OFFICES OF MICHAEL W. FORD</b> (local counsel) IL Bar # 0846139 4 Timberwood Lane Riverwoods, IL 60015 Tel. 847.948.7884 Email: mfordski@gmail.com</p> <p>-AND-</p> <p><u>/s/ Emil T. Bayko</u> Emil T. Bayko IL Bar # 0141356 <b>PREBEG, FAUCETT &amp; ABBOTT, PLLC</b> 8441 Gulf Freeway, Suite 307 Houston, TX 77017 Tel. 832.742.9260 Fax 832.742.9261 Email: tbayko@pfalawfirm.com</p> <p><b>ATTORNEYS FOR PLAINTIFF PETER M. GALLIGAN</b></p>	<p><u>/s/ per email authority 5/15/20</u> Brian Stolzenbach <b>SEFARTH SHAW LLP</b> 233 S. Wacker Drive, Suite 8000 Chicago, IL 60606-6448 Tel. 312.460.5551 Email: bstolzenbach@seyfarth.com mtroy@seyfarth.com thoran@seyfarth.com</p> <p><b>ATTORNEYS FOR DEFENDANTS ADTALEM GLOBAL EDUCATION, INC., F/K/A DEVRY EDUCATION GROUP, ET AL.</b></p>
--	---

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document was served on all counsel of record in this matter, including those listed below, by filing it using the Court's CM/ECF system on today's date:

Brian Stolzenbach  
Megan Troy  
Thomas Horan  
SEYFARTH SHAW LLP  
233 S. Wacker Drive, Suite 8000  
Chicago, IL 60606-6448  
Tel. 312.460.5551  
bstolzenbach@seyfarth.com  
mtroy@seyfarth.com  
thoran@seyfarth.com

DATED this 16<sup>th</sup> Day of May 2020.

/s/ Emil T. Bayko  
EMIL T. BAYKO